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Attorneys for Defendant FCA US LLC

**UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA
SOUTHERN DIVISION**

LYNN GRIMSTAD, an individual, and on
behalf of all others similarly situated, and
MARA MANUEL, an individual, and on
behalf of all others similarly situated,

Plaintiffs,

v.

FCA US LLC, a Delaware limited liability
company, and DOES 1-250, inclusive,

Defendants.

Case No. 8:16-cv-00763 – JVS-E

Assigned to the Honorable James V.
Selna

**STIPULATION TO EXTEND TIME
TO RESPOND TO INITIAL
COMPLAINT BY NOT MORE
THAN 30 DAYS (L.R. 8-3)**

Complaint served: April 5, 2016
Action removed: April 22, 2016
Current response date: April 29, 2016
New Response date: May 30, 2016

This Stipulation is entered into by and between the parties, plaintiffs, LYNN GRIMSTAD and MARA MANUEL (collectively “Plaintiffs”), and defendant, FCA US LLC (“Defendant”), through their respective undersigned counsel based upon the following facts:

1. Plaintiffs served their Complaint filed in the Superior Court for the State of California, County of Orange on April 5, 2016;

2. Defendant filed a Notice of Removal to the United States District Court for the Central District of California, Southern Division on April 22, 2016;

3. Plaintiffs and Defendant (collectively “Parties”) agreed to extend the time in which Defendant is to answer, move, or otherwise plead to the Complaint herein from April 29, 2016 to May 30, 2016;

4. No other extensions have been requested or ordered.

IT IS HEREBY STIPULATED by and between the Parties, through their respective undersigned counsel that:

1. Defendant shall have to and including May 30, 2016 in which to answer, move, or otherwise plead to the Complaint herein.

DATED: April 28, 2016

THOMPSON COBURN LLP

By: /s/ Rowena Santos
Rowena Santos

Attorneys for defendant FCA US LLC

DATED: April 28, 2016

A.O.E. LAW & ASSOCIATES, INC.

By: /s/ Victoria T. Orafa
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****Pursuant to Local Rule 5-4.3.4(a)(2), I, Rowena Santos, attest that all other signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.**